

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

D-1 Ronnie SMITH,  
 D-2 Jordan JACKSON,  
 D-3 Brandon KEEL,  
 D-4 Jayson WILLIAMS,  
 D-5 Kashawn JACKSON,  
 D-6 Makaela OURSO, and  
 D-7 TayQuan McWILLIAMS

Case No.

Case: 2:23-mj-30331

Assigned To : Unassigned

Assign. Date : 8/10/2023

Description: COMP USA V. SEALED  
MATTER (KB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2023 through April 2023 in the county of Wayne and Macomb in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 371	Engaged in a conspiracy
18 U.S.C. § 2312	Transportation of stolen vehicles
18 U.S.C. § 2313	Sale or receipt of stolen vehicles

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

*Complainant's signature*Special Agent Sean Callaghan - FBI*Printed name and title*Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: August 10, 2023City and state: Detroit, Michigan

*Judge's signature*Honorable Anthony P. Patti, U.S. Magistrate Judge*Printed name and title*

**Affidavit:**

I, Sean Callaghan, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation and have investigated a variety of federal criminal violations, including violent crime, bank robberies, crimes against children, and various financial crimes, for approximately 20 years. I am currently assigned to the Detroit Metropolitan Identity Theft and Financial Crimes Task Force.

2. The information contained in this affidavit is based on reports that I have reviewed, documents and information provided by witnesses interviewed during this investigation, and materials provided by the Troy Police Department and the Ohio State Highway Patrol concerning their investigations. The victims/witnesses who were interviewed by officers and agents pursuant to this investigation provided complete identification information (none were anonymous sources). However, I am identifying them in this affidavit, which will become public, only by their initials to protect their identities.

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I didn't include every fact I

know concerning this investigation, but only the facts that I believe are necessary to establish probable cause to believe that Ronnie Smith, Jordan Jackson, Brandon Keel, Jayson Keith Williams, Kashawn Jackson, Makaela Ourso, and TayQuan McWilliams (together, “the suspects”) have engaged in a conspiracy under 18 U.S.C. § 371 to violate 18 U.S.C. § 2312 (transportation of stolen vehicles) and 18 U.S.C. § 2313 (sale or receipt of stolen vehicles).

### **Probable Cause**

4. My investigation shows that, in March and April 2023, the suspects stole or attempted to steal at least seven vehicles from Pennsylvania, Virginia, Tennessee, West Virginia, and Indiana, and transported all of the stolen vehicles across state lines, usually ending up in Michigan or Ohio. As explained by Ronnie Smith in paragraphs 45 and 46 below, one of the group’s leaders after his arrest, my investigation revealed that different combinations of the suspects participated in the thefts and attempted thefts, and performed varying roles (logistics, lookout, driver, seller). Here are seven incidents of theft or attempted theft by the suspects in March and April 2023.

a. **Incident 1: Theft of a 2018 Black Jeep Grand Cherokee Trackhawk from Pennsylvania**

**Suspects involved in this theft:**

Ronnie Smith  
Jordan Jackson  
Makaela Ourso  
Brandon Keel

5. On March 25, 2023, a 2018 black Jeep Grand Cherokee Trackhawk was stolen from the long-term parking lot of the Pittsburgh International Airport in Pennsylvania. J.G. parked the above listed vehicle on March 24, 2023. On March 31, 2023, J.G. returned to the airport and could not find his vehicle. A review of surveillance video revealed a vehicle matching the above description leaving the parking lot at approximately 9:35AM on March 25, 2023.

6. Cell cite data places Smith and Jordan Jackson's phones in the vicinity of the Pittsburgh International Airport in Pennsylvania on the morning of March 25, 2023, around the time of the theft.

7. Surveillance video shows a black Chevrolet Traverse registered to Ourso exiting the tollbooth of the airport parking lot at 9:39AM. The stolen Jeep piggybacks through that exit lane on the same transaction.

8. Smith sent Ourso a Telegram message with a picture of this stolen vehicle at 9:47AM: 12 minutes after it was stolen.

9. A law enforcement check of an Automated License Plate Recognition (ALPR) system showed the stolen vehicle in transit that same day in Beaver Center Township, Pennsylvania, at approximately 9:59AM. This location is approximately 20-25 minutes north of the airport. The Allegheny County, Pennsylvania, Police Department entered the Traverse's plate into an ALPR system. ALPR's show both the stolen Jeep and the traverse in Beaver County, Pennsylvania, on the same road within seconds of each other later that same day.

10. And other ALPR images show that the stolen vehicle was subsequently in Warrensville Heights, Ohio, and then Toledo, Ohio, later that same day.

11. The Toledo Police Department recovered the Trackhawk on April 2, 2023. The vehicle was unoccupied and located at XXXX Macomber Street, Toledo, Ohio. This is the residence of Makaela Ourso, aka Lola.

12. And a review of text messages between Smith and Ourso on April 1, 2023—the day before police recovered the stolen vehicle, and

April 2, 2023—the day it was recovered, confirm Ourso’s awareness of the stolen vehicle:

**Texts from April 1, 2023:**

Ourso: They been driving thru here multiple times a day its gtg

Smith: Bro it’s gone get moved

Smith: The police is not worried bout that car bro they done gone came in back yard to get another car n didn’t do bun to it

Ourso: Earlier they were sitting there for a while on Millbury St watching the yard

Smith: Police ain’t watching no yard stop trippin if they wanted they car they would’ve took it

**Texts from April 2, 2023:**

Smith: You be in police shit

Smith: On

Smith: Why was yo camera of

Smith: It don’t add up

Ourso: I literally sent you the video

Smith: Send it to this phone

Ourso: (sends two videos and two still photos to Smith’s phone. On video is of the Toledo PD impounding the stolen ride from her house)

Ourso: IDK who else would do that

Ourso: Brandon knew about it

Ourso: I’m really a sold ass bitch it kinda hurts my feelings you acting this way towards me

13. When Smith was later arrested in Michigan (with Jordan Jackson and TayQuan McWilliams in the car with him), the VIN for

this stolen Jeep was found in the ProPad seized from the vehicle. In my training and experience, a ProPad can be used to program a key fob to a car, allowing someone to access and operate a vehicle, and is commonly used in modern day car thefts.

14. Finally, when officers recovered the stolen Jeep, they found several empty containers of Prestone Antifreeze Coolant and an AutoZone receipt for a store in Toledo, Ohio, dated March 27, 2023 (two days after the theft), inside. Investigators reviewed CCTV footage from this AutoZone and saw Keel and Jordan Jackson enter the AutoZone: the Trackhawk was parked outside. Jordan Jackson was the driver of the Trackhawk and backed into a parking spot. Later, Keel and Jordan Jackson can later be seen under the Trackhawk's hood. (See images 1 and 2 below).



**Images 1 and 2: Keel, Jordan Jackson, and the stolen Trackhawk**

b. **Incident 2: Theft of a 2020 Red Jeep Grand Cherokee Trackhawk from Virginia**

**Suspects involved in this theft:**

Ronnie Smith  
Brandon Keel  
Jordan Jackson  
TayQuan McWilliams

15. On March 31, 2023, at approximately 7:30AM, a 2020 red Jeep Grand Cherokee Trackhawk was stolen from the lot of Ourisman Chrysler Jeep Dodge Ram in Woodbridge, Virginia. The suspects arrived in a black Jeep Grand Cherokee at approximately 7:28AM and left in tandem with the stolen vehicle at 7:34AM. Data from the stolen Trackhawk's internal modem show that the Jeep traveled through Pennsylvania, Ohio, and Michigan before staying several days at a location in Eastpointe, Michigan, associated with Smith.

16. Cell cite data places Smith, Keel, and Jordan Jackson's phones in the vicinity of Woodbridge, Virginia, on the morning of March 31, 2023, around the time of the theft.

17. A review of McWilliams phone shows a video from March 15, 2023, of a Ourisman Chrysler Jeep Dodge Ram salesman talking about the Trackhawk for sale in their lot. Meaning McWilliams had some some research into the Trackhawk at least 16 days prior to it being stolen.



And text messages between Smith and McWilliams on March 31—the day the vehicle was stolen—show that McWilliams asked to sell the stolen vehicle:

**Texts from March 31, 2023:**

McWilliams: You grabbed it

Smith: Yessir

McWilliams: Let me sell it

18. Finally, the VIN for this vehicle was also found in the ProPad seized after Smith's arrest in Michigan (with Jordan Jackson and TayQuan McWilliams in the car with him).

**c. Incident 3: Theft of a 2021 Black Jeep Grand Cherokee Trackhawk from Pennsylvania**

**Suspects involved in this theft:**

Ronnie Smith

Brandon Keel

Jordan Jackson

19. On March 31, 2023, this black Trackhawk was stolen from the long-term parking lot at the Pittsburgh International Airport in Pennsylvania. Victim S.R. parked the vehicle on March 28, 2023, at approximately 2:30PM before boarding a flight. S.R. returned on April 3, 2023, and found that his vehicle was not where he left it. ALPR data showed that the vehicle left the airport by March 31, 2023, at 2:41PM.

20. Cell cite data places Smith, Keel, and Jordan Jackson's phones in the vicinity of the Pittsburgh airport in the afternoon on March 31, 2023, around the time of the theft. This data shows that Smith, Keel, and Jordan Jackson's phones went from the theft in Woodbridge, Virginia, to this theft in Pittsburgh, Pennsylvania, and then on to Ohio.

21. Toledo Police Department officers read the stolen vehicle's plate several times between March 31 and April 2, 2023, meaning the vehicle was in the Toledo area at that time.

22. Finally, the VIN for this vehicle was also found in the ProPad seized after Smith's arrest in Michigan (with Jordan Jackson and TayQuan McWilliams in the car with him).

d. **Incident 4: Attempted vehicle theft in Tennessee**

**Suspects involved in this attempted theft:**

Ronnie Smith  
Brandon Keel  
Kashawn Jackson  
Jordan Jackson

23. On April 5, 2023, at around 3:00AM, the Nashville Tennessee Airport Department of Public Safety (NADPS) investigated a group of individuals traveling in a 2020 Toyota Rav 4 rented by C.D. Based on their investigation (what they observed) of the Rav 4 and its

occupants, officers suspected that this group was attempting to burglarize and/or steal motor vehicles. Officers in Tennessee reviewed surveillance video and were able to identify Brandon Keel, Kashawn Jackson, and Jordan Jackson as the individuals associated with the Rav 4. Based on additional review of the surveillance video, a detective from the Troy Police Department familiar with this investigation was also able to identify Ronnie Smith as part of that same group in Nashville.

24. Cell cite data places Smith, Keel, Jordan Jackson, and Kashawn Jackson in the vicinity of the Nashville airport in the morning on April 5, 2023, around the time of the theft.

25. Further, a review of text messages between Smith and Kashawn Jackson on April 4, the day before the attempted vehicle theft, shows their planning and agreement to steal a vehicle in Nashville:

**Texts from April 4, 2023:**

Kashawn Jackson: Where you trynna go

Kashawn Jackson: I'm trynna slide

Kashawn Jackson: Got 2 drivers

Kashawn Jackson: I'm boutta be with Jmoney (Jayson Williams)  
inna min wha you on

Smith: You bringing yo box?

Kashawn Jackson: Yea

Smith: Bet me n j money (Jayson Keith Williams) was fin take my redeye to Nashville so get yo driver ready

Based on my training and experience, the term “box” is a slang word for the ProPad. Further, “redeye” may be referring to the previously aforementioned red Jeep Grand Cherokee Trackhawk.

26. On April 6, 2023, Smith appeared in Oakland County Circuit Court in Michigan. A review of surveillance video showed that Smith’s girlfriend, C.D., drove him to the courthouse in the same Toyota Rav 4 identified by the NADPS the day before, April 5, 2023, at the Nashville Airport.

e. **Incident 5: Theft of a 2021 Black Dodge Durango from Indiana**

**Suspects involved in this theft:**

Ronnie Smith  
Brandon Keel  
Jordan Jackson  
Kashawn Jackson

27. On April 5, 2023, the Durango was stolen from the parking garage of the Indianapolis International Airport in Indiana. N.P. arrived at the airport on March 31, 2023, and parked his vehicle on the second level of the garage. N.P. returned from his trip with his family on April 8, 2023, but was not able to locate his vehicle. N.P. told police

that a couple days prior he had received a notification that his T-Mobile SynxUP drive device had been removed from the on-board diagnostics port of his Durango.

28. Cell cite data places Smith, Keel, and Kashawn Jackson's phones at the Indianapolis Airport in Indiana on the morning of April 5, 2023, around the time of the theft.

29. A review of Smith's text messages showed that he sent Keel an address for Eureka Auto Glass in Detroit, Michigan, after the theft. Smith also sent Keel a text message telling Keel that he will give him money for the window and told him to ask the company to clean out the glass. Investigators spoke to H.A. at Eureka Auto Glass who confirmed that Keel brought in a Dodge Durango just before closing time on April 5, 2023, and had them replace a window. Keel told H.A. that he lived out of state and said that someone broke out the window while he was at the mall.

30. A search warrant for historical GPS coordinates corresponding to the stolen Durango's infotainment system confirmed that the Durango went from Indiana to Michigan where it stopped at Eureka Auto Glass and a nearby Family Dollar in Detroit. Investigators

reviewed CCTV footage from this Family Dollar and saw the Durango enter the parking lot. Investigators watched Keel get out of the Durango and enter the store. A short time later, Keel exited the store and got back in the Durango. A ping warrant for the stolen Durango's internal modem led to the vehicle's recovery. Officers saw the Durango in Hazel Park, Michigan, with a fraudulent Michigan license plate. Police then recovered the stolen Durango.

31. Further, a review of text messages between Smith and Kashawn Jackson on April 5, 2023, the day of the theft, confirms that Smith and Keel had the window in the stolen Jeep fixed.

**Texts from April 5, 2023:**

Kashawn Jackson: I left ma mom phone

Smith: Where

Smith: Don't see it

Kashawn Jackson: Arm rest

Smith: I see it we fin get window fixed n come right back

**f. Incident 6: Theft of a 2020 Blue Dodge Charger SRT Hellcat from West Virginia**

**Suspects involved in this theft:**

Ronnie Smith

Jordan Jackson

Jayson Keith Williams

32. On April 9, 2023, the Charger was stolen from the lot at Morgantown Dodge Stellantis in Morgantown, West Virginia.

33. Cell cite data places Smith and Jordan Jackson's phones near the dealership in West Virginia on April 9, 2023, around the time of the theft.

34. Investigators obtained surveillance video from a nearby BP gas station for April 9 that showed a black Chevrolet Malibu (which appears to be the same Malibu rented by Jordan Jackson three days prior (*see* paragraph 40) at the gas station a few minutes before the stolen Charger arrived at approximately 4:51AM. The video shows that Williams was driving the stolen Charger.

35. Investigators also obtained an ALPR image of the stolen Charger and a black Malibu (believed to be the same Malibu described above) driving in tandem in Toledo, Ohio, later that same day at approximately 2:49PM. The next day the Charger led Ohio State Patrol officers on a high-speed chase on at approximately 8:37PM. The vehicle had a license plate registered to a 2015 Dodge Charger stolen out of Perrysburg, Ohio.

36. The stolen Charger was ultimately recovered at an address associated with Smith in Eastpointe, Michigan (the same address in Eastpointe referenced in paragraph 15).

37. Finally, the VIN for this vehicle was also found in the ProPad seized after Smith's arrest in Michigan (with Jordan Jackson and TayQuan McWilliams in the car with him).

**g. Incident 7: Attempted vehicle thefts in Indiana**

**Suspects involved in this attempted theft:**

Ronnie Smith  
Jordan Jackson  
TayQuan McWilliams

38. On April 13, 2023, J.T. reported to police that someone broke into his car, a 2017 Dodge Challenger Hellcat, while it was parked in the lot of the Stellantis Plant where he is employed in Kokomo, Indiana. B.W. also reported that his vehicle, a 2022 Dodge Charger Scat Pack, was broken into while it was parked at the same Stellantis Plant on the same day: April 13, 2023. Both J.T. and B.W. found their car windows smashed out but neither vehicle was taken.

39. Cell cite data places Smith and Jordan Jackson's phone at the Stellantis Plant on April 13, 2023, around the time of the attempted thefts. And when officers searched TayQuan McWilliams' phone, they



found that the location of the Stellantis Plant in Kokomo, Indiana, was inside his Waze GPS location application.

40. On April 6, 2023, Jordan Jackson rented a 2022 Chevrolet Malibu. By April 13, 2023, law enforcement was tracking the Malibu. Location data for the Malibu shows it in the area of the Stellantis Plant in Kokomo, Indiana, around the time of the attempted robberies. Further, location data from the Malibu shows that it was also at several airports in multiple states during Jordan Jackson's rental period. Based on my investigation in this case, the suspects often stole vehicles from airports as part of their scheme.

41. Jackson's Malibu was stopped multiples times by law enforcement in different states during this period, and each time officers found Smith, Jordan Jackson, and McWilliams in the vehicle. The officers in these stops also saw a ProPad in the Malibu; Smith, Jordan Jackson, and McWilliams were released after each of these stops.

42. Finally, the VIN for both of these vehicles were also found in the ProPad seized after Smith's arrest in Michigan (with Jordan Jackson and TayQuan McWilliams in the car with him).

**Arrest and interview of Ronnie Smith**

**Suspects identified by Smith as coconspirators:**

Jordan Jackson  
Kashawn Jackson  
Brandon Keel  
Jayson Keith Williams  
Makaela Ourso (aka “Lola”)

43. By April 13, 2023, Smith had multiple felony warrants for his arrest, including one with seven counts of receiving and concealing stolen motor vehicles. And Troy police officers continued to track the 2022 Chevrolet Malibu rented by Jordan Jackson (with Smith and McWilliams as fellow passengers). Troy police contacted the Michigan State Police (MSP) and requested that they conduct a traffic stop on the vehicle. MSP located the vehicle and arrested Smith: Jordan Jackson and TayQuan McWilliams were also in the vehicle. McWilliams had a Dodge brand key fob in his left front pocket, and a search of the vehicle revealed multiple cell phones, key fobs, burglary tools, and a ProPad device with connection cords used to steal cars. Based on my training and experience, people who seek to steal cars will carry additional key fobs to program the key fobs to the stolen cars with the ProPad.

44. Analysis of the ProPad device revealed several VINs corresponding to the aforementioned stolen vehicles including:

- a. 2018 Jeep Grand Cherokee Trackhawk stolen from the Pittsburgh International Airport on March 25, 2023, and recovered from Toledo, Ohio;
- b. 2020 Jeep Red Grand Cherokee Trackhawk stolen from a dealership in Woodbridge, Virginia, on March 31, 2023, and which is believed to have traveled through Pennsylvania, Ohio, and Michigan;
- c. 2021 Black Jeep Grand Cherokee Trackhawk stolen at the Pittsburgh International Airport on March 31, 2023, and which is believed to have traveled into Ohio;
- d. 2020 Blue Dodge Charger SRT Hellcat stolen from a dealership in Morgantown, West Virginia, on April 9, 2023, which is believed to have traveled into Ohio, and was recovered in Michigan;
- e. 2017 Dodge Challenger Hellcat that had its window smashed out in Kokomo, Indiana, on April 13, 2023; and
- f. 2022 Dodge Charger Scat Pack that had its window smashed out in Kokomo, Indiana, on April 13, 2023.

45. On April 17, 2023, officers gave Smith his *Mirada* rights and interviewed him. Smith admitted to traveling out of state to steal cars. Smith identified Jayson Keith Williams as the person depicted in the photograph behind the wheel of the 2020 Blue Dodge Charger SRT Hellcat, described in paragraph 34. Smith said that Williams drove that vehicle during the high-speed chase with police in Ohio. Smith stated that he told Williams to drive the Charger to the residence in Eastpointe where it was recovered. Smith also says that he gave the keys to the Charger to someone who then left them for the police. Smith admitted to traveling across the country with Jordan Jackson, Kashawn Jackson, Brandon Keel, Jayson Keith Williams, and Lola to steal cars.

46. Smith explained that you need six people when you're stealing four cars at a time. Smith said that he had a variety of roles including paying for gas and food for all involved, acting as a lookout, and buying, selling, and driving stolen cars. Smith explained that he doesn't normally drive the stolen cars but admitted to driving the 2020 Red Jeep Grand Cherokee Trackhawk around after Williams drove it from Virginia to Michigan. Smith also provided investigators with the pass code to his cell phone.

**Analysis of Smith's cell phone and iCloud account**

47. A review of Smith's cellphone and iCloud account revealed several text messages between Smith, McWilliams, Keel, Kashawn Jackson, Jordan Jackson, and Ourso. These messages discussed specific cars, travel, equipment, drivers, odometer readings, and locations of buyers and prices for vehicles. The messages also reference "J Money," believed to be Jayson Keith Williams. Smith's phone contains several pictures and videos of cars, guns, and money. One video in the phone shows Smith taking a video of the stolen 2020 Red Jeep Grand Cherokee Trackhawk taken from Woodbridge, Virginia, on March 31, 2023. The video was shot in a garage; TPD Detective Morgan identified it as the same garage in Eastpointe where he recovered the 2020 Blue Dodge Charger SRT Hellcat stolen in West Virginia on April 9, 2023. While shooting the video on his phone, Smith captured his own image via a reflection in the vehicle's windows.

48. Further, the phone contained a picture of McWilliams with a ProPad on his lap on April 13, 2023.

49. The following chart shows each of the suspect's involvement in the seven vehicle thefts and attempted thefts discussed above (in

addition to Smith identifying Jordan Jackson, Kashawn Jackson, Brandon Keel, Jayson Keith Williams, and Makaela Ourso (aka “Lola) as coconspirators):

<b>Vehicle(s)</b>	<b>Location/Cell Cite Data at Scene of Car Theft</b>	<b>Text Messages</b>	<b>Video</b>
2018 Black Jeep Grand Cherokee Trackhawk	Ronnie Smith Jordan Jackson	Text messages between Smith and Ourso	CCTV of Keel and Jordan Jackson at AutoZone
2020 Red Jeep Grand Cherokee Trackhawk	Ronnie Smith Brandon Keel Jordan Jackson	Text messages between Smith and McWilliams	
2021 Black Jeep Grand Cherokee Trackhawk	Ronnie Smith Brandon Keel Jordan Jackson		
Attempted vehicle theft in Tennessee	Ronnie Smith Brandon Keel Kashawn Jackson Jordan Jackson	Text messages between Smith and Kashawn Jackson	Surveillance video of Ronnie Smith Brandon Keel Kashawn Jackson Jordan Jackson
2021 Black Dodge Durango	Ronnie Smith Brandon Keel Kashawn Jackson	Text messages between Smith and Kashawn Jackson	CCTV of Keel at Eureka Auto Glass
2020 Blue Dodge Charger SRT Hellcat	Ronnie Smith Jordan Jackson		Surveillance at BP Gas Station of Jayson Keith Williams
2017 Dodge Challenger Hellcat, 2022 Dodge Charger Scat Pack (Attempt)	Ronnie Smith Jordan Jackson TayQuan McWilliams		

50. Based on the foregoing, there is probable cause to believe that Ronnie Smith, Jordan Jackson, Brandon Keel, Jayson Williams,

Kashawn Jackson, Makaela Ourso, and TayQuan McWilliams (the suspects) were involved in a conspiracy under 18 U.S.C. § 371 to violate 18 U.S.C. § 2312 (transportation of stolen vehicles) and 18 U.S.C. § 2313 (sale or receipt of stolen vehicles).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Callaghan', written over a horizontal line.

Sean Callaghan, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence  
and/or by reliable electronic means

A handwritten signature in blue ink, appearing to read 'A. P. Patti', written over a horizontal line.

Hon. Anthony P. Patti  
United States Magistrate Judge

Date: August 10, 2023